

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Civil Rule 5(C) and the Modified Protective Order (Dkt. No. 203), Plaintiffs respectfully move this Court to seal portions of Exhibits N and O to Plaintiffs’ Memorandum of Law in Opposition to Defendant’s Motion *in Limine*. The withheld information is derived from exhibits and deposition designations that were requested to be sealed in the 33 non-parties’ Disclosure Objections. (*See* Dkt. No. 1147, at 2 n.1). The Court granted the sealing and redactions requests of the 33 non-parties. (Dkt. No. 1147.) Plaintiffs hereby certify that they request sealing of the above-described materials pursuant to the Court’s August 9, 2024 Order (Dkt. No. 1147), and that, prior to entry of that Order, the Plaintiffs met-and-conferred with counsel for Microsoft and Equativ regarding the material designated for sealing.

Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court’s convenience.

Dated: August 23, 2024

Respectfully submitted,

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